

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 832

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information, and belief:

1. On March 8, 2023, the United States Bankruptcy Court for the District of Delaware (the “Court”) approved the *Confidentiality Agreement and Stipulated Protective Order* [D.I. 832] entered into by the Debtors, the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “Committee”), and certain other parties.

2. The Debtors, the Committee, and the Federal Deposit Insurance Corporation as Receiver for Signature Bank and the Federal Deposit Insurance Corporation as Receiver for Signature Bridge Bank, N.A. (the “FDIC-Receiver” and, collectively with the Debtors and the Committee, the “Parties”), by and through their counsel, have entered into the *Addendum to Confidentiality Agreement and Stipulated Protective Order* (the “Protective Order Addendum”)² to facilitate and expedite the production, exchange, and treatment of Confidential Records owned,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Terms utilized but not otherwise defined herein shall have the same meanings as ascribed to them in the Protective Order Addendum.

controlled, or in the custody of the FDIC-Receiver to be produced or otherwise disclosed in connection with discovery undertaken during these Chapter 11 Cases, including adversary proceedings and contested matters. A proposed form of order (the “Proposed Order”) approving the Protective Order Addendum is attached hereto as Exhibit 1, and a copy of the Protective Order Addendum is attached as Exhibit A thereto.

3. Pursuant to local rule 9018-1(h) of the Local Rules for the United States Bankruptcy Court for the District of Delaware, counsel for the Debtors submitted a draft of the Protective Order Addendum to counsel for the United States Trustee (the “U.S. Trustee”) for review on November 2, 2023. Thereafter, the U.S. Trustee advised that it has no objection to the Protective Order Addendum or the Proposed Order as attached hereto. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

4. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: November 14, 2023
Wilmington, Delaware

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/s/ Matthew B. McGuire

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